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October 18, 2022

Hon. Vernon S. Broderick
U.S. District Court
Southern District of New York
40 Foley Square
New York, NY 10007

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US v. John Graves, 22 Cr. 142 (VSB)

Dear Judge Broderick:

We represent John Graves in this matter. Mr. Graves was released on June 24, 2022, on a personal recognizance bond. Mr. Graves is under home incarceration with pretrial supervision and travel restricted to the Southern and Eastern Districts of New York. Mr. Graves is also undergoing drug testing and treatment.


Mr. Graves is charged in this case with a non-violent drug offense and has been compliant with the conditions of his release over the last three, going on four, months.

We respectfully request that Mr. Graves be allowed to be released from home incarceration to go trick or treating with his children on the afternoon of October 30 on Roosevelt Island.

Pre-trial Services objects to this request, citing its standing policy of “object[ing] to all leave requests for social purposes for defendants subject to home incarceration,” and not any circumstances unique to Mr. Graves. The government defers to the position of Pre-Trial Services.

We appreciate the Court’s consideration.

Respectfully submitted,

APPLICATION DENIED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 10/26/2022

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